

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 03-
	:	
v.	:	DATE FILED: _____
	:	
LAWRENCE HURD,	:	21 U.S.C. § 841(a)(1) (Possession with
a/k/a “Little L”	:	the intent to distribute more than five
CHARLES KENNEDY,	:	grams of cocaine base - 1 count)
a/k/a “Chuckie Brewer”	:	
	:	21 U.S.C. § 860 (Possession with the
	:	intent to distribute more than five
	:	grams of cocaine base within 1,000
	:	feet of a school - 1 count)
	:	
	:	18 U.S.C. § 924(c) (Possession of a firearm
	:	in furtherance of a drug trafficking crime
	:	- 1 count)
	:	
	:	18 U.S.C. § 922(q) (Possession of a
	:	firearm within 1,000 feet of a school
	:	- 1 count)
	:	
	:	18 U.S.C. § 922(k) (Possession of a
	:	firearm with an obliterated/altered
	:	serial number - 1 count)
	:	
	:	21 U.S.C. § 846 (Conspiracy to
	:	distribute more than five grams
	:	of cocaine base - 1 count)
	:	
	:	21 U.S.C. § 841(a)(1) (Distribution of
	:	cocaine base - 2 counts)
	:	
	:	18 U.S.C. § 2 (Aiding and abetting)
	:	
	:	Notice of Forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about May 17, 2002, in the Eastern District of Pennsylvania, the defendant,

**LAWRENCE HURD,
a/k/a “Little L,”**

did knowingly and intentionally possess with the intent to distribute more than five grams, that is approximately 44.2 grams, of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 17, 2002, in the Eastern District of Pennsylvania, the defendant,

**LAWRENCE HURD,
a/k/a “Little L,”**

did knowingly and intentionally possess with the intent to distribute more than five grams, that is approximately 44.2 grams, of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising Gordon Middle School, located at 351 Kersey Street, Coatesville, Pennsylvania, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

In violation of Title 21, United States Code, Section 860.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 17, 2002, in the Eastern District of Pennsylvania, the defendant,

**LAWRENCE HURD,
a/k/a “Little L,”**

did knowingly possess a firearm which had the serial number altered and obliterated and had been shipped and transported in interstate commerce, that is, a Ruger, model P95, 9mm semiautomatic pistol, serial number obliterated.

In violation of Title 18, United States Code, Sections 922(k) and 924(a)(1)(B).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 17, 2002, in the Eastern District of Pennsylvania, the defendant,

**LAWRENCE HURD,
a/k/a “Little L,”**

did knowingly possess a firearm that has moved in and affected interstate commerce, that is, a Ruger, model P95, 9mm semiautomatic pistol, serial number obliterated, at Ash Park Apartments, Coatesville, Pennsylvania, a place that the defendant knew and had reasonable cause to believe was within 1,000 feet of the grounds of the Gordon Middle School, a public school located at 351 Kersey Street, Coatesville, Pennsylvania.

In violation of Title 18, United States Code, Sections 922(q)(2)(A) and 924(a)(4).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 17, 2002, in the Eastern District of Pennsylvania, the defendant,

**LAWRENCE HURD,
a/k/a “Little L,”**

knowingly possessed a firearm, that is, a Ruger, model P95, 9mm semiautomatic pistol, serial number obliterated, in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, that is, possession with the intent to distribute more than five grams of cocaine base (“crack”).

In violation of Title 18, United States Code, Section 924(c).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. From in or about October of 2002 through in or about December of 2002, in the Eastern District of Pennsylvania, the defendants,

**LAWRENCE HURD,
a/k/a “Little L”
CHARLES KENNEDY,
a/k/a “Chuckie Brewer,”**

knowingly and intentionally conspired and agreed together and with others known and unknown to the grand jury to knowingly and intentionally distribute more than five grams, that is approximately 5.4 grams, of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a) and 841(b)(1)(B).

MANNER AND MEANS

2. It was part of the conspiracy that defendants distributed controlled substances from various locations in and around Coatesville and West Chester, Pennsylvania.

3. It was part of the conspiracy that defendants provided security and communication between each other regarding the distribution of controlled substances.

OVERT ACTS

In furtherance of the conspiracy, and in order to accomplish its objects, the following overt acts, among others, were performed by defendants and others known and unknown to the grand jury in the Eastern District of Pennsylvania between in or about October of 2002 through in or about December of 2002:

1. On or about October 28, 2002, a person known to the grand jury placed a telephone call to defendant LAWRENCE HURD, a/k/a “Little L,” to arrange for the purchase of crack cocaine. Hurd arranged to meet with that person at a location in West Chester, PA.

2. Defendants LAWRENCE HURD, a/k/a “Little L,” and CHARLES

KENNEDY, a/k/a "Chuckie Brewer," then met the person known to the grand jury and a government agent at a location in West Chester, PA. At that location, defendant KENNEDY sold directly to the government agent approximately 3.7 grams of cocaine base ("crack") for \$300. At the conclusion of the sale, defendant HURD instructed the undercover agent to call him directly in the future and he would "take care of" the undercover agent.

3. On or about November 19, the government agent placed a call to defendant LAWRENCE HURD, a/k/a "Little L," to arrange for the purchase of crack cocaine. Defendant HURD instructed the agent to meet him at a specific location in Coatesville, PA.

4. The government agent then went to the location to meet with LAWRENCE HURD, a/k/a "Little L." At the location, defendant CHARLES KENNEDY, a/k/a "Chuckie Brewer," met the government agent. Defendant KENNEDY stated that HURD had sent him to meet with the government agent, and that he and HURD were partners. Defendant KENNEDY then sold directly to the government agent approximately 1.7 grams of cocaine base ("crack") for \$150.

All in violation of Title 21, United States Code, Section 846.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 28, 2002, in the Eastern District of Pennsylvania, the
defendants,

**LAWRENCE HURD,
a/k/a “Little L”
CHARLES KENNEDY,
a/k/a “Chuckie Brewer,”**

did knowingly and intentionally distribute, and did aid and abet the distribution of, a mixture or
substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled
substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C),
and Title 18, United States Code, Section 2.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 19, 2002, in the Eastern District of Pennsylvania, the defendants,

**LAWRENCE HURD,
a/k/a “Little L”
CHARLES KENNEDY,
a/k/a “Chuckie Brewer,”**

did knowingly and intentionally distribute, and did aid and abet the distribution of, a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 922(k) and (q) and 924(c), as set forth in this Indictment, the defendant,

**LAWRENCE HURD,
a/k/a "Little L,"**

shall forfeit to the United States of America, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), all firearms and ammunition involved in the commission of these offenses, including, but not limited to: a Ruger, model P95, 9mm semiautomatic pistol, serial number obliterated, and six (6) live rounds of ammunition.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney